1	Jeffrey I. Hasson
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5	Washington State Bar No. 23741 Attorney for I.Q. Data International, Inc.
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10	UNITED STATES DISTRICT COURT
11	FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE
12	LIZABETH GLASS AND BRIAN Case No.:
13	NOTICE OF REMOVAL
	Plaintiffs,
14	VS.
15	
16	CARROLL'S CREEK APARTMENTS PROPERTY OWNER, LLC, JRK
	RESIDENTIAL GROUP, INC. DBA TWO
17	COAST LIVING and I.Q. DATA INTERNATIONAL, INC.,
18	INTERNATIONAL, INC.,
	Defendants.
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20	Please take notice that defendant I.Q. Data International, Inc. ("I.Q. Data") hereby
21	removes this action from the Superior Court in and for King County, State of Washington to the
22	United States District Court for the Western District of Washington at Seattle.
23	1. Defendant I.Q. Data is a party in a civil action brought against it in the Superior
24	Court in and for King County, State of Washington entitled: "LIZABETH GLASS AND BRIAN
25	REBESCHINI, Plaintiffs, v. CARROLL'S CREEK APARTMENTS PROPERTY OWNER,
26	LLC, JRK RESIDENTIAL GROUP, INC. DBA TWO COAST LIVING and I.Q. DATA
	NOTICE OF REMOVAL 1 Case No. HASSON LAW, LLC 9385 SW Locust Street Tigard, OR 97223 Telephone No. (503) 255-5352 Facsimile No. (503) 255-6124

1	INTERNATIONAL, INC., Defendant, No. (Unfiled)". A copy of "Plaintiffs' Complaint for
2	Violations of 15 U.S.C. § 1692 et seq. and RCW Chapters 19.16 and 19.86 et seq." and
3	Summons to each Defendant in that action are attached to this notice and constitute all process,
4	pleadings, and orders delivered to a representative of I.Q. Data in that action up to the present
5	date.
6	2. Also attached are the consents of Carroll's Creek Apartments Property Owner,
7	LLC and JRK Residential Group, Inc. dba Two Coast Living to Removal.
8	3. The state court action was commenced when I.Q. Data was served with Summons
9	and Complaint on November 29, 2023 for an action captioned in the Superior Court of the State
10	of Washington for the County of King.
11	4. Defendants have filed no pleadings in this cause.
12	5. This notice of removal is filed within 30 days after receipt by I.Q. Data of a copy
13	of the initial pleading setting forth the claim for relief upon which such action or proceeding is
14	based.
15	6. This is an action of civil nature over which this court has original jurisdiction
16	pursuant to 15 USC § 1692k in that it is a liability allegedly created under the Fair Debt
17	Collection Practices Act, 15 USC § 1692 et seq.,
18	7. This notice is signed pursuant to FRCP 11.
19	Dated: December 20, 2023.
20	s/ Jeffrey I. Hasson Jeffrey I. Hasson, WSBA#23741
21	Hasson Law, LLC Phone: (503) 255-5352
22	Attorney for I.Q. Data International, Inc.
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Certificate of Service 1 2 I hereby certify that on <u>December 20, 2023</u>, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: T. Tyler Santiago, Jason D. Anderson, Jessica Kamish and I hereby certify that I have 3 mailed by United States Postal Service the document to the following non-CM/ECF participants: 4 s/ Jeffrey I. Hasson 5 Jeffrey I. Hasson, WSBA#23741 Attorney for I.Q. Data 6 Hasson Law, LLC 9385 SW Locust Street 7 Tigard, OR 97223 Phone: (503) 255-5352 8 Facsimile: (503) 255-6124 E-Mail: hasson@hassonlawllc.com 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

NOTICE OF REMOVAL -- 3 Case No.

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